

EXHIBIT 15

From: Anaïs Berland
Sent: Friday, August 13, 2021 2:53 PM
To: mmoonsammy@kaplanfox.com
Cc: Sami Rashid; Richard Vagas
Subject: Pork Antitrust - JBS USA Production

Counsel,

In response to Plaintiffs' August 5, 2021 request, please find a link to documents that are being produced on behalf of JBS USA Food Company ("JBS USA") from *In re Pork Antitrust Litigation*, Case No. 18-cv-1776 (the "*Pre-Existing Non-MDL Cases*") that we have been able to locate with reasonable efforts. These documents are produced pursuant to the terms of the Order Regarding the Production of Electronically Stored Information and Paper Documents [Dkt. 21], and the confidentiality of these documents has been designated thereupon pursuant to the terms of the Protective Order [Dkt. 18]. Passwords to access this production will be sent via separate correspondence.

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Please click on the following links to download the production:

JBS-PORK PRODUCTION:

[Click here to download the file\(s\) listed below](#)

DAP Discovery Requests.zip	12.69 MB
JBS-PORK VOL001.zip	34.83 MB

If the link above does not open, please copy and paste the following URL into your browser:
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JBS-PORK PRODUCTION VOL. 002:

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JBS-PORK VOL002.zip	10.06 GB
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JBS-PORK PRODUCTION VOL. 003:

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JBS-PORK VOL003.7z 175.01 MB

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JBS-PORK PRODUCTION VOL. 004:

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JBS-PORK VOL004.zip 12.14 GB

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<https://sendfile.quinnemanuel.com/pkg?token=469d03cb-0f14-49b7-be7a-2f62cd996d93>

The secure message expires on 8/20/21 9:59:04 AM

Thank you,
Anais

Anais Berland

Associate

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From: Richard Vagas
Sent: Saturday, April 3, 2021 3:33 PM
To: 'tschneider@schneiderwallace.com'; 'pschneider@schneiderwallace.com';
'kbates@schneiderwallace.com'; 'mweiler@schneiderwallace.com'; 'jorosa@justicia.pr.gov'
Cc: Sami Rashid
Subject: RE: JBS USA Products & Channels

Counsel,

We write with regard to the “additional information regarding the categories of products [JBS USA] sold during the class period and channels those products are sold into” that JBS USA previously provided on March 19 pursuant to the Stipulation to Amend the Pretrial Scheduling Order Regarding Deadline on Structured Data filed on March 9 [Dkt. 727]. On March 26 and March 29, Class Plaintiffs and Puerto Rico offered to exclude the following product types made or sold by Defendants from the definition of “Pork,” including with regard to the structured data to be produced:

- Renderings/Byproducts – products not used for human consumption (except lard), which are cooked for industrial/feed use, like blood meal, bone meal, and grease;
- Offal/Variety Products – products removed from the carcass during the harvest and fabrication process, such as bones, fat, headmeat, and other organs (with the exceptions of feet and hearts);
- Franks – hot dogs and various types of franks that include non-pork meat; and
- Multi-ingredient products – such as breakfast sandwiches, burritos, and sausage tots.

JBS USA agrees that those product types should be excluded from the definition of “Pork”; and, therefore, JBS USA will exclude such product types from its structured data production, including all products within the following, previously-identified categories:

- **Inedible Byproducts** (e.g. Blood Plasma, Mucosa, Pet Food);
- **Rendering** (e.g. Lard, Meat & Bone Meal);
- **Other Cuts** (e.g. Fatback Skins, Neckbones, Tails); and
- **Variety Meats** (e.g. Stomachs, Ears, Livers).

To reach resolution, JBS USA is willing to agree not to exclude feet and hearts sold to customers located in Puerto Rico from its structured data production even if such products fall within the categories indicated above. JBS USA reserves all rights to exclude such products or any additional products from the case in the future.

Thanks,
Rich

Richard T. Vagas
Of Counsel,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Richard Vagas

Sent: Friday, March 19, 2021 4:48 PM

To: tschneider@schneiderwallace.com; pschneider@schneiderwallace.com; kbates@schneiderwallace.com; mweiler@schneiderwallace.com; jorosa@justicia.pr.gov

Cc: Sami Rashid <samirashid@quinnemanuel.com>

Subject: JBS USA Products & Channels

Counsel,

Pursuant to the Stipulation to Amend the Pretrial Scheduling Order Regarding Deadline on Structured Data filed on March 9 [Dkt. 727], below please find "additional information regarding the categories of products [JBS USA] sold during the class period and channels those products are sold into."

Specifically, JBS USA sold the following categories of products during the class period:

- **Bacon**
- **Bellies** (e.g. Sheet Belly, Skinless Belly, Rib on Belly)
- **Butts** (e.g. Boneless Butt, Bone In Boston Butt, Shoulders)
- **Centercuts** (e.g. Bone In Rib Ends, Boneless Sirloin Ends)
- **Hams** (e.g. Boneless Ham, Bone In Ham)
- **Inedible Byproducts** (e.g. Blood Plasma, Mucosa, Pet Food)
- **Lean Trim** (e.g. Ham Trim, Blade Trim, Ground Pork)
- **Loins** (e.g. Boneless Half Loin, Back Rib, Riblets, Tenderloin)
- **Other Cuts** (e.g. Fatback Skins, Neckbones, Tails)
- **Picnics** (e.g. Bone In Whole Picnic, Cushions, Boneless Picnic Cushion In)
- **Rendering** (e.g. Lard, Meat & Bone Meal)
- **Ribs** (e.g. Spareribs, St. Louis Ribs)
- **Variety Meats** (e.g. Stomachs, Hearts, Ears, Livers)

JBS USA sold all categories listed above into the Processing channel. Further, JBS USA sold all categories listed above except Inedible Byproducts and Rendering into the Foodservice, International, and Retail channels.

Thanks,
Rich

Richard T. Vagas

Of Counsel,

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